

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

VERY REVEREND GEORGES F. de  
LAIRE, J.C.L.,

Plaintiff,  
v.

GARY MICHAEL VORIS, ANITA CAREY,  
ST. MICHAEL'S MEDIA a/k/a CHURCH  
MILITANT and MARC BALESTRIERI,

Defendants.

CIVIL ACTION NO. 1:21-cv-00131-JL

**PLAINTIFF THE VERY REVEREND GEORGES F. de LAIRE, J.C.L.'S  
MOTION FOR TEMPORARY RESTRAINING ORDER**

Pursuant to Fed. R. Civ. P. 65(b), Plaintiff the Very Reverend Georges F. de Laire, J.C.L. respectfully submits this Motion for a Temporary Restraining Order to enjoin Defendants Gary Michael Voris, Anita Carey, and St. Michael's Media A/K/A Church Militant (collectively, "Defendants"), and all persons acting in concert with Defendants, from, directly or indirectly transferring, redistributing, reallocating, or otherwise dissipating, any of the net proceeds earned from the imminent sales of 2840 Hilton Road, Ferndale, Michigan, and 2900 Hilton Road, Ferndale, Michigan, two separate properties currently under contract for sale by St. Michael's Media.

This Motion is made upon the grounds that Father de Laire is suffering and will continue to suffer immediate and irreparable injury, loss or damage due to the Defendants' unlawful conduct. Moreover, Defendants admit they have "limited resources," which is understood to refer to financial resources. Thus, given the Defendants' conduct in this action to date, there is a real and justified concern that in light of this anticipated and new cash flow, the

Defendants will actively undertake to improperly limit Plaintiff's ability to recover any amounts awarded to him, whether pursuant to the Court's sanctions order, a future judgment and assessment of damages, and/or an award for costs and attorney's fees, by transferring or otherwise dissipating the anticipated proceeds.

In further support of this Motion, Father de Laire respectfully refers the Court to his Motion to Attach with Notice and the corresponding Memorandum of Law, which are filed contemporaneously herewith.

This Motion for Temporary Restraining Order is submitted with Notice to the Defendants by email to their counsel, which email also advises of Father de Laire's intention to seek a hearing on this Motion.<sup>1</sup>

**REQUEST FOR HEARING**

Father de Laire hereby requests a hearing on this Motion.

[SIGNATURES ON NEXT]

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<sup>1</sup> Prior to filing this Motion, on December 15, 2023, Father de Laire attempted to reach resolution and agreement with Defendants' counsel (who has not yet been permitted to withdraw from this case) regarding escrowing the proceeds of the sale. As of today, no response was made to this request.

Dated: December 21, 2023

Respectfully submitted,

THE VERY REVEREND GEORGES F. DE LAIRE

By His Attorneys,

/s/ Joseph M. Cacace

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/s/ Suzanne M. Elovecky

Suzanne M. Elovecky, *pro hac vice*

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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of December, 2023 a copy of the foregoing document was filed via ECF and transmitted to all counsel of record through that system.

/s/ Suzanne M. Elovecky

Suzanne M. Elovecky